## Exhibit 31

September 23, 2013

Page 1 Page 3 UNITED STATES DISTRICT COURT APPEARANCES EASTERN DISTRICT OF NEW YORK ERIC T. SCHNEIDERMAN OFFICE OF THE ATTORNEY GENERAL MARTIN TANKLEFF, STATE OF NEW YORK Plaintiff, 120 BROADWAY No. 09CV1207 New York, New York 10271-0332 (JS)(WDW) BY: JOSEPH TIPALDO, ESQ., -against-THE COUNTY OF SUFFOLK, K. JAMES ASSISTANT ATTORNEY GENERAL McCREADY, NORMAN REIN, CHARLES **CLAIMS BUREAU** KOSCIUK, ROBERT DOYLE, JOHN **SCARING & CARMAN PLLC** MCELHONE, JOHN DOE POLICE Attorneys for Deponent OFFICERS #1-10, RICHARD DOE 666 Old Country Road SUFFOLK COUNTY EMPLOYEES #1-10, Suite 501 Defendants. Garden City, New York 11530-2004 BY: SUSAN SCARING CARMAN, ESQ. September 23, 2013 516-683-8500 scarman@scaringlaw.com.com 1:08 p.m. ALSO PRESENT: Deposition of TODD STEUERMAN, taken by Plaintiff at the offices of Barket, Marion, MARTIN TANKLEFF Epstein & Kearon, 666 Old Country Road, Garden EDWARD SATTLER, Videographer City, New York 11530, before Anneliese R. Tursi, a Registered Professional Reporter and Notary Public within and for the State of New York. Page 2 Page 4 APPEARANCES STIPULATIONS IT IS HEREBY STIPULATED AND AGREED MILLER CHEVALIER by and between the attorneys for the Attorneys for Plaintiff 655 Fifteenth Street, N.W. respective parties herein that filing Suite 900 and sealing be and the same are hereby Washington, D.C. 20005-5701 waived. BY: BARRY J. POLLACK, ESQ. IT IS FURTHER STIPULATED AND AGREED that all objections, except as to 202-626-5800 bpollack@milchev.com the form of the question, shall be DENNIS M. BROWN reserved to the time of the trial. SUFFOLK COUNTY ATTORNEY IT IS FURTHER STIPULATED AND Attorney for Defendants AGREED that the within deposition may be H. Lee Dennison Building signed and sworn to before any officer authorized to administer an oath with 5th Floor 100 Veterans Memorial Highway the same force and effect as if signed Hauppauge, New York 11788 and sworn to before the Court. BY: BRIAN C. MITCHELL, ESQ., ASSISTANT COUNTY ATTORNEY

#### Page 5 Page 7 T. STEUERMAN 1 T. STEUERMAN 2 2 it. Is that all right? THE VIDEOGRAPHER: This is tape 3 A. Okay. 3 No. 1 of the videotaped deposition of Mr. Todd Steuerman, taken by the 4 Q. You are going to need to vocalize an answer because the court reporter cannot 5 plaintiff in the matter Martin Tankleff, 6 get down a nod or a shake of the head. 6 plaintiff, versus the County of Suffolk, et al., defendants, in the United States 7 A. Um-hum. 8 District Court for the Eastern District 8 Do you understand if you have a problem with a question, just let me know and 9 of New York, Case No. CV 091207 (JS) I will repeat it or rephrase it. Okay? 10 (WDW). Okay. 11 11 This deposition is being held at 12 And if at any point during the 12 the offices of Barket, Marion, Epstein & 13 afternoon you want to take a break for any Kearon, 666 Old Country Road, Garden 13 reason, just let me know and we will take a 14 City New York on September 23, 2013, at 14 break. Okay? 15 approximately 1:08 p.m. 15 16 A. Okav. My name is Ed Sattler. I'm the 16 17 So if you don't ask me to repeat 17 certified legal video specialist. The court reporter is Anneliese Tursi in 18 or rephrase a question and you give an answer, 18 we are all going to assume that you understood 19 association with Esquire Deposition 20 the question. Okay? 20 Solutions. 21 Α. Okay. 21 Will counsel please introduce Mr. Steuerman, you were born on 22 themselves and who they represent for 22 23 23 July 20th, 1965? the record. Yes. 24 MR. POLLACK: Barry Pollack on 24 Α. 25 behalf of the Plaintiff, Mr. Tankleff, 25 And in 1983, Mr. Steuerman, you Page 6 Page 8 1 T. STEUERMAN T. STEUERMAN 1 2 and Mr. Tankleff is also present. 2 were charged with distributing cocaine? 3 MR. TANKLEFF: Martin Tankleff, 3 On advice of my attorney, I take Α. 4 the Fifth. plaintiff. 4 5 MR. TIPALDO: Joseph Tipaldo, the 5 Q. Where did those sales of cocaine 6 Office of the Attorney General. 6 take place? 7 MR. MITCHELL: And for the County 7 A. On advice of my attorney, I take 8 of Suffolk it's Brian C. Mitchell, and the Fifth. 8 I'm appearing on behalf of Dennis M. 9 9 The fact is, Mr. Steuerman, you 10 Brown, the Suffolk County Attorney. 10 were selling cocaine out of one of the bagel MS. CARMAN: For the witness, 11 stores that you owned with your father. Is 12 Susan Carman from the law firm of 12 that correct? 13 Scaring & Carman. 13 A. On advice of my attorney, I take 14 TODD STEUERMAN. 14 the Fifth. Q. You owned a bagel store with your 15 residing at 58 Northern Boulevard, 15 16 Hagaman, New York 12086, having been 16 father, Jerry Steuerman? 17 first duly sworn/affirmed by the Notary 17 A. On advice of my attorney, I take

18

19

22

24

23 names.

25 the Fifth.

the Fifth.

Q.

Α.

examined and testified as follows: EXAMINATION BY MR. POLLACK:

18

19

20 21

22

23

Q. Mr. Steuerman, I'm going to be asking you a series of questions this afternoon. If at any point you don't

Public (Anneliese R. Tursi), was

24 understand a question or don't hear a

25 question, just ask me to repeat it or rephrase

And in those 1983 charges, you

On advice of my attorney, I take

20 were represented by Sullivan Spota Mallito &

will correct me if I'm mispronouncing the

Massey? I'm sure there are folks here who

## **TODD STEUERMAN**

September 23, 2013

TAI	NKLEFF vs. COUNTY OF SUFFOLK		9–12
	Page 9	_	Page 11
1	T. STEUERMAN	1	T. STEUERMAN
2	Q. Mr. Steuerman, do you think that	2	Q. Valium?
3	you may incriminate yourself by confirming who	3	A. On advice of my attorney, I take
4	represented you in that case?	4 5	the Fifth. Q. Xanax?
6	MR. MITCHELL: Objection A. On advice of my attorney, I take	6	<ul><li>Q. Xanax?</li><li>A. On advice of my attorney, I take</li></ul>
7	the Fifth.	7	the Fifth.
8	MR. MITCHELL: Did you get that?	8	Q. And you were also convicted of
9	I objected to the form of his question.	9	selling marijuana?
10	Q. And I guess one last instruction,	10	A. On advice of my attorney, I take
11	Mr. Steuerman, if you do hear an objection, if	11	the Fifth.
12	you can just stop your answer so that the	12	Q. And those sales also occurred out
13	attorney has the opportunity to enter his		of a bagel store owned by you and your father.
14	objection. The court reporter can't get	14	Is that correct?
15	things down if two people are talking at the	15	A. On advice of my attorney, I take
16	same time. Okay?	16	the Fifth.
17	A. Okay.	17	Q. Did you consult with Mr. Sullivan
18	Q. With respect to the 1983 cocaine	18	with respect to those charges?
19	charges, you spoke to Gerard Sullivan about	19	A. On advice of my attorney, I take
20	those charges. Is that correct?	20	the Fifth.
21	A. On advice of my attorney, I take	21	Q. Did you also consult with Mr.
22		22	Spota with respect to those charges?
23	Q. And you also spoke with his	23	A. On advice of my attorney, I take
24	partner, Thomas Spota?	24	the Fifth.
25	<ul> <li>A. On advice of my attorney, I take</li> </ul>	25	Q. Did you obtain legal advice from
	Page 10		Page 12
1	T. STEUERMAN	1	T. STEUERMAN
2	the Fifth.	2	Mr. Spota with respect to those charges?
3	Q. Who referred you to Mr. Sullivan	3	A. On advice of my attorney, I take
4	and Mr. Spota's law firm for purposes of	4	the Fifth.  Q. Other than the 1983 and the 1989
5	representing you in the 1983 cocaine charges?	5	
6	A. On advice of my attorney, I take the Fifth.	6 7	charges, are there other legal matters on
8	Q. In that case you had told an	8	which you consulted with or obtained legal advice from Mr. Sullivan?
9	undercover police officer: Just call me here	9	A. On advice of my attorney, I take
10	any time you want more blow, my father owns	10	the Fifth.
11	the place so it's cool. Is that correct?	11	Q. Other than the 1983 and 1989
12	A. On advice of my attorney, I take		charges, were there other legal matters with
1	the Fifth	l .	which you consulted with or obtained legal

- 13 the Fifth.
- 14 Q. And in November of 1989 you were 15 charged with the sale and possession of 16 narcotics. Is that correct?
- A. On advice of my attorney, I take 17 18 the Fifth.
- 19 Q. Specifically, you were charged 20 with selling cocaine. Correct?
- A. On advice of my attorney, I take 21 22 the Fifth.
- 23 Q. Diazepam, correct?
- A. On advice of my attorney, I take 24 25 the Fifth.

- 13 which you consulted with or obtained legal 14 advice from Mr. Spota?
- A. On advice of my attorney, I take 15 16 the Fifth.
- 17 Q. You were also charged with selling 18 narcotics from the Smithtown Motor Lodge. Is 19 that correct?
- A. On advice of my attorney, I take 20 21 the Fifth.
- 22 Q. When you were incarcerated in 23 Clinton Correctional Facility, you met another 24 inmate there by the name of Bruce Demps. Is 25 that correct?

September 23, 2013 13–16

	WILLII VS. COUNTI OF SULFOLK		13-10
1	Page 13 T. STEUERMAN	1	Page 15 T. STEUERMAN
2	A. On advice of my attorney, I take	2	illegal controlled substances out of bagel
3	the Fifth.	3	stores that were owned by either you or your
4	MR. MITCHELL: Could you spell	4	father. Is that correct?
5	• •	5	A. On advice of my attorney, I take
6	that guy's last name.  MR. POLLACK: Sure. Demps.	6	the Fifth.
7	D-E-M-P-S.	7	Q. And your father, Jerry Steuerman,
		1	
8	MR. MITCHELL: Thank you.	8	knew that you were selling illegal drugs. Is that correct?
9	Q. And, Mr. Steuerman, you told Mr.	9	
10	Demps that you knew that Marty Tankleff was	10	A. On advice of my attorney, I take the Fifth.
11	not involved in the murder of his parents. Is	11 12	
12	that correct?	1	Q. In fact, your father, Jerry
13	A. On advice of my attorney, I take	13	•
14	the Fifth.	14	narcotics or illegal substances with you. Is
15	Q. In fact, you told Mr. Demps that	15	that correct?
16	your father, Jerry Steuerman, had put a hit on	16	A. On advice of my attorney, I take
17	the Tankleffs. Is that correct?	17	
18	A. On advice of my attorney, I take	18	Q. Mr. Steuerman, I want to focus
19	the Fifth.	19	• • • • • • • • • • • • • • • • • • • •
20	Q. And regardless of the precise	20	,
21	words, the substance of what it was that you	21	Tankleff was murdered and Mr. Seymour Tankleff
22	were conveying is that your father hired	22	* *
23	somebody to murder the Tankleffs. Is that	23	•
24	correct?	24	•
25	<ul> <li>A. On advice of my attorney, I take</li> </ul>	25	<ul> <li>A. On advice of my attorney, I take</li> </ul>
	Page 14		Page 16
1	T. STEUERMAN	1	T. STEUERMAN
2	T. STEUERMAN the Fifth.	1 2	T. STEUERMAN the Fifth.
2	T. STEUERMAN the Fifth. Q. At Mr. Demps's request you had	3	T. STEUERMAN the Fifth. Q. As of that date did your father,
2 3 4	T. STEUERMAN the Fifth. Q. At Mr. Demps's request you had your father, Jerry Steuerman, hire people to	3 4	T. STEUERMAN the Fifth. Q. As of that date did your father, Jerry Steuerman, know detective James
2 3 4 5	T. STEUERMAN the Fifth. Q. At Mr. Demps's request you had your father, Jerry Steuerman, hire people to threaten a gentleman who was, according to Mr.	3 4 5	T. STEUERMAN the Fifth. Q. As of that date did your father, Jerry Steuerman, know detective James McCready?
2 3 4 5 6	T. STEUERMAN the Fifth. Q. At Mr. Demps's request you had your father, Jerry Steuerman, hire people to threaten a gentleman who was, according to Mr. Demps, messing with Mr. Demps' girlfriend. Is	3 4 5 6	T. STEUERMAN the Fifth. Q. As of that date did your father, Jerry Steuerman, know detective James McCready? A. On advice of my attorney, I take
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	T. STEUERMAN  the Fifth.  Q. At Mr. Demps's request you had your father, Jerry Steuerman, hire people to threaten a gentleman who was, according to Mr. Demps, messing with Mr. Demps' girlfriend. Is that correct?  A. On advice of my attorney, I take the Fifth.  Q. You also had your father hire people to physically beat a Clinton Correctional Officer that was having an affair with your wife. Is that correct?  A. On advice of my attorney, I take the Fifth.  Q. Over a period of years in the 1980s, Mr. Steuerman, you were selling narcotics. Correct?  A. On advice of my attorney, I take the Fifth.  Q. You were selling illegal controlled substances. Correct?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	T. STEUERMAN  the Fifth. Q. As of that date did your father, Jerry Steuerman, know detective James McCready? A. On advice of my attorney, I take the Fifth. Q. You had seen Detective James McCready in at least one of the bagel stores owned by you or your father prior to the time that the Tankleffs were killed. Is that correct? A. On advice of my attorney, I take the Fifth. Q. As of September 7, 1988, the date of the Tankleff murders let me put it this way. Prior to that date, Detective McCready had done work for your father, Jerry Steuerman. Is that correct? A. On advice of my attorney, I take the Fifth. Q. Your father had paid money to
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September 23, 2013 17–20

Page 19

Page 20

# Page 17 1 T. STEUERMAN 2 Q. Specifically, he paid money to 3 Detective McCready for construction work. Is 4 that correct? 5 A. On advice of my attorney, I take 6 the Fifth.

- 7 Q. He had also paid money to
- 8 Detective McCready to protect the drug sale9 business that you were engaged in. Is that
- 10 correct?

1

- 11 A. On advice of my attorney, I take 12 the Fifth.
- 13 Q. In the months leading up to
- 14 September 7th, 1988, your father, Jerry
- 15 Steuerman, and Seymour Tankleff were arguing.16 Is that correct?
- 17 A. On advice of my attorney, I take 18 the Fifth.
- 19 Q. In fact, you were present for more 20 than one argument between them. Is that 21 correct?
- A. On advice of my attorney, I take the Fifth.
- Q. And you were aware in the summer of 1988 that your father, Jerry Steuerman,

### T. STEUERMAN

2 wanted to open a new bagel store with you.3 Correct?

4 A. On advice of my attorney, I take 5 the Fifth.

- Q. Specifically, your father wantedto open a new store with you in Ronkonkoma?
- 8 A. On advice of my attorney, I take 9 the Fifth.
- Q. And you were aware that SeymourTankleff wanted to be a 50 percent owner in
- 12 that new store. Is that correct?
- 13 A. On advice of my attorney, I take 14 the Fifth.
- Q. And your father did not wantSeymour Tankleff to have any ownership
- 17 interest in that new business. Is that
- 18 correct?
- 19 A. On advice of my attorney, I take 20 the Fifth.
- Q. And it was ownership of that new
- 22 store with you that was the source of one of
- the areas of disagreement between your fatherand Seymour Tankleff?
- 25 A. On advice of my attorney, I take

#### T. STEUERMAN

2 the Fifth.

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4

25

1

- Q. You purchased your interest in that new store from your father. Correct?
- 5 A. On advice of my attorney, I take 6 the Fifth.
- Q. Specifically, you paidapproximately \$125,000 for that ownershipinterest in the new store?
- 10 A. On advice of my attorney, I take 11 the Fifth.
- 12 Q. And that took the form of about 13 \$65,000 in cash and about \$60,000 of debt 14 forgiveness. Is that correct?
- 15 A. On advice of my attorney, I take 16 the Fifth.
- 17 Q. In the summer of 1988 you owed 18 your father about \$60,000. Is that correct?
- 19 A. On advice of my attorney, I take 20 the Fifth.
- 21 Q. And that \$60,000 debt related to 22 your drug business. Is that correct?
- A. On advice of my attorney, I take the Fifth.
  - Q. Seymour Tankleff had a lien

#### T. STEUERMAN

2 against equipment in the bagel store that you3 operated and were part owner of. Is that4 correct?

- 5 A. On advice of my attorney, I take 6 the Fifth.
- Q. And that lien was also a subjectof argument between your father and SeymourTankleff?
- 10 A. On advice of my attorney, I take 11 the Fifth.
- 12 Q. You know a gentleman by the name 13 of Joseph Creedon. Correct?
- 14 A. On advice of my attorney, I take 15 the Fifth.
- 16 Q. And you met Mr. Creedon prior to 17 September 7th, 1988?
- 18 A. On advice of my attorney, I take 19 the Fifth.
- Q. And, in fact, you met Mr. Creedon while selling drugs. Is that correct?
- A. On advice of my attorney, I take the Fifth.
- Q. There were occasions on which Mr.Creedon robbed you. Correct?

## TODD STEUERMAN

September 23, 2013 21 - 24

#### TANKLEFF vs. COUNTY OF SUFFOLK Page 21 Page 23 T. STEUERMAN 1 T. STEUERMAN 2 On advice of my attorney, I take 2 Α. that correct? 3 the Fifth. 3 A. On advice of my attorney, I take 4 Q. Specifically, he robbed you of 4 the Fifth. 5 5 proceeds from your drug business? Q. You knew Mr. Glass as of September 7th, 1988? 6 6 On advice of my attorney, I take 7 the Fifth. 7 A. On advice of my attorney, I take 8 Q. And you made payments to Mr. 8 the Fifth. 9 Creedon for protection? 9 Q. And your father, Jerry Steuerman, also knew Mr. Glass? 10 A. On advice of my attorney, I take the Fifth. 11 A. On advice of my attorney, I take 11 12 12 the Fifth. Q. And when I say for protection, Q. You were aware, Mr. Steuerman, 13 specifically, you paid Mr. Creedon, one, so 13 that your father was looking to hire somebody 14 that he wouldn't rob you any more. Correct? 14 to either kill or physically harm Arlene and 15 Α. On advice of my attorney, I take 15 Seymour Tankleff. Is that correct? the Fifth. 16 16 17 Q. And you also paid him, two, to 17 A. On advice of my attorney, I take 18 protect you from others. Is that correct? 18 the Fifth. 19 A. On advice of my attorney, I take 19 Q. Your father specifically told you 20 20 prior to September 7th, 1988 that he was the Fifth. looking to hire somebody to intimidate, 21 Q. There were also occasions where 21 22 physically harm or murder Arlene and Seymour 22 you paid Mr. Creedon to collect drug debts 23 23 that were owed to you? Tankleff? A. On advice of my attorney, I take 24 A. On advice of my attorney, I take 24 25 the Fifth. 25 the Fifth. Page 22 Page 24 1 1 T. STEUERMAN T. STEUERMAN 2 Q. And you used Mr. Creedon for debt 2 Q. Shortly after Mrs. Tankleff was

3 collection on multiple occasions. Is that correct?

5 A. On advice of my attorney, I take 6 the Fifth.

4

25

7 Q. And that included that you use Mr. 8 Creedon to collect drug debts for you prior to September 8, 1988? 9

10 A. On advice of my attorney, I take 11 the Fifth.

12 Q. Your father, Jerry Steuerman, knew

13 Mr. Creedon as well. Is that correct?

A. On advice of my attorney, I take 14 15 the Fifth.

16 Q. Your father, Jerry Steuerman, knew

17 Mr. Creedon prior to September 7th, 1988?

18 A. On advice of my attorney, I take 19 the Fifth.

20 Q. In fact, you were the one who 21 introduced Mr. Creedon to your father, Jerry 22 Steuerman?

23 A. On advice of my attorney, I take 24 the Fifth.

Q. You also knew Brian Glass. Is 3 murdered and Mr. Tankleff was attacked, your father disappeared. Is that correct?

5 On advice of my attorney, I take the Fifth. 6

7 Q. He feigned his own death. Is that 8 correct?

9 Α. On advice of my attorney, I take 10 the Fifth.

11 Q. And he was later found living in 12 California under an assumed name. Is that 13 correct?

14 A. On advice of my attorney, I take 15 the Fifth.

16 Q. Before he left he told you that he 17 was going to feign his death and disappear. 18 Correct?

19 A. On advice of my attorney, I take 20 the Fifth.

21 Q. And, in fact, he asked that you report him missing to the police. Is that 22 correct? 23

24 A. On advice of my attorney, I take 25 the Fifth.

September 23, 2013 25–28

#### Page 25 Page 27 T. STEUERMAN T. STEUERMAN 2 You were aware at the time that 2 the Fifth. Q. 3 one of the people who went out to California 3 Q. Your father told Mr. Creedon after to find your father was Detective McCready. 4 he had refused to drop the charges, that Mr. 5 Is that correct? Creedon was, quote: Fucking with the wrong 6 A. On advice of my attorney, I take people. Is that correct? the Fifth. 7 7 A. On advice of my attorney, I plead 8 Q. And, in fact, you have said to at 8 the Fifth. 9 least one person that you thought it was 9 Q. Your father, Jerry Steuerman, told 10 particularly ironic that it was a friend of you about the conversation that he had with 11 your father, Detective McCready, who went out Mr. Creedon about Mr. Creedon declining your 12 to get him in California. Is that correct? 12 father's offer to drop the charges. Is that 13 A. On advice of my attorney, I take 13 correct? 14 the Fifth. 14 A. On advice of my attorney, I plead 15 Q. In April of 1989 you told Joseph 15 the Fifth. 16 Creedon that your father would pay him, Mr. 16 Q. As of September 7th, 1988, you Creedon, to cut Marty Tankleff's tongue out of 17 knew Peter Kent. Is that correct? 18 Marty's mouth. Is that correct? 18 A. On advice of my attorney, I plead the Fifth. 19 A. On advice of my attorney, I take 19 20 20 the Fifth. Q. You had engaged in criminal 21 activities with Peter Kent? Q. You also told Mr. Creedon that 21 22 your father, Jerry Steuerman, would pay Mr. 22 A. On advice of my attorney, I plead 23 Creedon to have someone killed. Is that 23 the Fifth. 24 correct? 24 Q. As of September 7th, 1988 you knew 25 25 Glen Harris? Α. On advice of my attorney, I take Page 26 Page 28 1 T. STEUERMAN 1 T. STEUERMAN the Fifth. 2 2 Α. 3

5

Q. You specifically conveyed an offer from your father to pay him \$10,000 to have 5 somebody killed.

6 A. On advise of my attorney, I plead 7 the Fifth.

8 Q. Approximately two weeks later, also in April of 1989, you shot Joseph 10 Creedon. Is that correct?

11 A. On advice of my attorney, I plead 12 the Fifth.

13 Q. Why did you shoot Mr. Creedon?

14 Α. On advice of my attorney, I plead 15 the Fifth.

16 Q. After you shot Mr. Creedon, you 17 are aware that your father, Jerry Steuerman, offered Mr. Creedon \$10,000 to drop the 19 charges against you. Are you not?

20 Α. On advice of my attorney, I plead 21 the Fifth.

22 Mr. Creedon told you that he would 23 not agree to drop the charges. Is that 24 correct?

25

On advice of my attorney, I plead

On advice of my attorney, I plead 3 the Fifth.

4 Q. You had engaged in criminal activities with Glen Harris?

6 A. On advice of my attorney, I plead 7 the Fifth.

8 Q. In the 1980s, Mr. Steuerman, did 9 you carry a knife with you?

10 Α. On advice of my attorney, I plead 11 the Fifth.

12 Q. Did you have a habit of carrying a 13 knife with you?

14 On advice of my attorney, I plead Α. 15 the Fifth.

16 Q. In the late 1980s, did you sell 17 knives?

18 Α. On advice of my attorney, I plead 19 the Fifth.

20 Mr. Steuerman, did you ever give 21 or sell a knife to Joseph Creedon?

22 Α. On advice of my attorney, I plead 23 the Fifth.

24 Q. Did you ever give or sell a knife 25 to Peter Kent?

24 distributed illegal drugs to anyone affiliated25 with the Suffolk County District Attorney's

September 23, 2013 29–32

1	Page 29 T. STEUERMAN	1	T. STEUERMAN
2	A. On advice of my attorney, I plead	2	office?
3	the Fifth.	3	A. On advice of my attorney, I take
4	Q. Did you ever give or sell a knife	4	the Fifth.
5	to Glen Harris?	5	Q. Have you ever distributed illegal
6	<ul> <li>A. On advice of my attorney, I plead</li> </ul>	6	drugs with anybody affiliated with Suffolk
7	the Fifth.	7	County Police Department?
8	Q. Your father, Jerry Steuerman, has	8	A. On advice of my attorney, I take
9	admitted to you that he was responsible for	9	the Fifth.
10	the Tankleff murders.	10	Q. Have you ever distributed illegal
11	A. On advice of my attorney, I plead	11	drugs to any Suffolk County detective?
12	the Fifth.	12	A. On advice of my attorney, I take
13 14	, ,	13 14	the Fifth.
15		15	Q. Have you ever distributed illegal drugs to Detective James McCready?
16		16	
17	, , , , , , , , , , , , , , , , , , , ,	17	the Fifth.
18		18	Q. Have you ever distributed illegal
19	,	19	drugs to Detective Norman Rein?
20		20	A. On advice of my attorney, I take
21	BY MR. POLLACK:	21	the Fifth.
22	Q. Mr. Steuerman, have you ever told	22	Q. Have you ever served as a
23	anyone that you knew that Martin Tankleff was	23	
24	·	24	enforcement?
25	<ul> <li>A. On advice of my attorney, I take</li> </ul>	25	A. On advice of my attorney, I take
	Page 30		Page 32
1	T. STEUERMAN	1	T. STEUERMAN
2	the Fifth.	2	the Fifth.
4	Q. Mr. Steuerman, have you ever told anybody that you were involved in the murder	3	Q. Have you ever served as a confidential informant for any law enforcement
5	of the Tankleffs?	5	agency?
6	A. On advice of my attorney, I take	6	A. On advice of my attorney, I take
7	the Fifth.	7	the Fifth.
8	Q. Have you ever told anyone that you	8	Q. Mr. Steuerman, how frequently do
9	knew that your father was involved in the	l .	you speak with your father?
10	murder of the Tankleffs?	10	A. On advice of my attorney, I take
11	<ul> <li>A. On advice of my attorney, I take</li> </ul>	11	the Fifth.
12	the Fifth.	12	Q. Have you spoken with your father
13	<ul> <li>Q. Have you ever told anyone that you</li> </ul>	13	about the Tankleff murders since receiving
14	knew that your father knew Detective McCready	14	notice that you were going to be deposed in
15	prior to the Tankleff murders?	15	this lawsuit?
16	A. On advice of my attorney, I take	16	A. On advice of my attorney, I take
17	the Fifth.	17	the Fifth.
18	Q. Mr. Steuerman, have you ever	18	Q. You were originally represented
19	distributed illegal drugs to law enforcement	19	with respect to this deposition by an attorney
20	<u> </u>	20	by the name of frictin Lite. In that correct?
20	personnel?	20	by the name of Justin Lite. Is that correct?
21	personnel?  A. On advice of my attorney, I take	21	A. On advice of my attorney, I take
- 1	personnel?		•

24 who should represent you for purposes of this

25 deposition?

September 23, 2013 33–36

T. STEUERMAN  A. On advice of my attorney, I take the Fifth.  O. You retained the same law firm to represent you as the law firm that represented your father with respect to his deposition in this litigation. Is that correct?  A. On advice of my attorney, I take the Fifth.  O. Who is paying for your counsel to 11 appear here today?  A. On advice of my attorney, I take 12 A. On advice of my attorney, I take 13 the Fifth.  O. Mr. Steuerman, is there any 14 question of substance that I can ask you today 15 to which you would not assert your Fifth 16 A. On advice of my attorney, I take 16 the Fifth.  D. Mr. Steuerman, you understand, do 21 you not, that other than for murder, the 2 statute of limitations has run on any criminal 23 conduct you may have engaged in in the 1980s. 21 statute of limitations would not have run. Is that correct?  T. STEUERMAN 16 Fifth.  O. Do you have such an understanding? A. On advice of my attorney, I take 16 the Fifth.  O. And with murder or conspiracy to commit murder, you understand that the statute of limitations would not have run. Is that correct?  A. On advice of my attorney, I take 11 the Fifth.  O. And you believe that answering questions here today might incriminate you. 14 Is that correct?  A. On advice of my attorney, I take 11 the Fifth.  O. And you believe that answering questions here today might incriminate you. 15 A. On advice of my attorney, I take 16 the Fifth.  MR. POLLACK: I don't have any other questions.  MR. POLLACK: I don't have any other questions.  MR. POLLACK: I don't have any other questions.  MR. POLLACK: Thank you, Mr. Steuerman.		Page 33		Page 35
2 A. On advice of my attorney, I take 3 the Fifth. 3 C. Wou retained the same law firm to 5 represent you as the law firm that represented 6 your father with respect to his deposition in 7 this litigation. Is that correct? 8 A. On advice of my attorney, I take 9 the Fifth. 10 Q. Who is paying for your counsel to 1 appear here today? 12 A. On advice of my attorney, I take 14 Q. Mr. Steuerman, is there any 15 question of substance that I can ask you today 16 to which you would not assert your Fitth 17 Amendment rights? 18 A. On advice of my attorney, I take 19 the Fifth. 19 Q. Mr. Steuerman, you understand, do 20 you not, that other than for murder, the 21 statute of limitations has run on any criminal 22 conduct you may have engaged in in the 1980s. 24 Is that correct? 25 A. On advice of my attorney, I take 25 the Fifth. 26 Q. Do you have such an understanding? 27 A. On advice of my attorney, I take 28 the Fifth. 29 CERTIFICATE 29 TANELIESE R. TURSI. a 20 COUNTY OF NEW YORK ) 21 SANNELIESE R. TURSI. a 21 SANNELIESE R. TURSI. a 22 COUNTY OF NEW YORK ) 23 ANNELIESE R. TURSI. a 24 Negleted Proteogration 25 That the witness whose deposition of 26 Mr. Todd Steuerman and this completes tape No. 1.  (Time noted: 1:43 p.m.,  (Time note	1	T STEUERMAN	1	T STEUERMAN
3 the Fifth.  Q. You retained the same law firm to 5 represent you as the law firm that represented 6 your father with respect to his deposition in this littigation. Is that correct?  A. On advice of my attorney, I take 9 the Fifth.  Q. Who is paying for your counsel to 11 appear here today?  A. On advice of my attorney, I take 12 A. On advice of my attorney, I take 13 the Fifth.  Q. Mr. Steuerman, is there any 15 question of substance that I can ask you today 16 to which you would not assert your Fifth 7 Amendment rights? 17 8 A. On advice of my attorney, I take 16 the Fifth.  Q. Mr. Steuerman, you understand, do 21 you not, that other than for murder, the 2 statute of limitations has run on any criminal 23 conduct you may have engaged in in the 1980s. Is that correct?  A. On advice of my attorney, I take 15 the Fifth.  Q. Do you have such an understanding? A. On advice of my attorney, I take 16 the Fifth.  Q. And with murder or conspiracy to 7 commit murder, you understand that the statute of limitations would not have run. Is that 2 correct?  A. On advice of my attorney, I take 16 the Fifth.  Q. And you believe that answering 17 questions here today might incriminate you. Is that correct?  A. On advice of my attorney, I take 16 the Fifth.  MR. POLLACK: I don't have any 20 other questions.  Anything from either the AG or the County.  MR. MITCHELL: No, thank you.  MR. MR. MITCHELL: No, thank you.  MR. MR. MITCHELL: No, thank you.  MR. MR. POLLACK: Thank you, Mr. Steuerman.				
4 Q. You retained the same law firm to 5 represent you as the law firm that represented your father with respect to his deposition in 7 this litigation. Is that correct?  8 A. On advice of my attorney, I take 9 the Fifth.  10 Q. Who is paying for your counsel to appear here today?  12 A. On advice of my attorney, I take 13 the Fifth.  13 the Fifth.  14 Q. Mr. Steuerman, is there any 15 question of substance that I can ask you today to twinkin you would not assert your Fifth 7 Amendment rights?  11 A. On advice of my attorney, I take 19 the Fifth.  12 Q. Mr. Steuerman, you understand, do 19 you not, that other than for murder, the 20 statute of limitations has run on any criminal 20 conduct you may have engaged in in the 1990s. Is that correct?  12 T. STEUERMAN  13 T. STEUERMAN  14 T. STEUERMAN  15 T. STEUERMAN  15 T. STEUERMAN  16 Q. And with murder or conspiracy to commit murder, you understand that the statute of limitations would not have run. Is that 9 correct?  16 Q. And with murder or conspiracy to commit murder, you understand that the statute of limitations would not have run. Is that 9 correct?  17 Q. And you believe that answering 19 questions here today might incriminate you. Is that correct?  18 A. On advice of my attorney, I take 19 the Fifth.  19 Q. And you believe that answering 19 questions here today might incriminate you. Is that correct?  19 A. On advice of my attorney, I take 19 the Fifth.  20 Q. And you believe that answering 19 questions here today might incriminate you. Is that correct?  21 MR. POLLACK: I don't have any 19 the questions. MR. POLLACK: Thank you, Mr. Steuerman.				•
5 represent you as the law firm that represented your father with respect to his deposition in this litigation. Is that correct?  8 A. On advice of my attorney, I take the Fifth.  10 Q. Who is paying for your counsel to appear here today?  11 appear here today?  12 A. On advice of my attorney, I take the Fifth.  13 the Fifth.  14 Q. Mr. Steuerman, is there any question of substance that I can ask you today to which you would not assert your Fifth to A. On advice of my attorney, I take the Fifth.  15 to which you would not assert your Fifth to which you would not have run and you not, that other than for murder, the statute of limitations has run on any criminal conduct you may have engaged in in the 1980s. Is that correct?  1 T. STEUERMAN  2 the Fifth.  2 D. Do you have such an understanding?  A. On advice of my attorney, I take the Fifth.  Q. And with murder or conspiracy to commit murder, you understand that the statute of limitations would not have run. Is that correct?  A. On advice of my attorney, I take the Fifth.  Q. And you believe that answering questions here today might incriminate you. Is that correct?  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney, I take the Fifth.  A. On advice of my attorney in the statute of limitations would not have run. Is that correct?  A. On advice of my attorney in the statute of limitations would not have run. Is that the correct?  A. On advice of my attorney in the statute of limitations would not have run. Is that the Fift				
6 your father with respect to his deposition in this litigation. Is that correct? 8 A. On advice of my attorney, I take the Fifth. 9 TODD STEUERMAN 10 Q. Who is paying for your counsel to appear here today? 11 A. On advice of my attorney, I take this. It is a day of	_			•
7 this litigation. Is that correct? 8 A. On advice of my attorney, I take 9 the Fifth. 10 Q. Who is paying for your counsel to 11 appear here today? 12 A. On advice of my attorney, I take 13 the Fifth. 13 the Fifth. 14 Q. Mr. Steuerman, is there any 15 question of substance that I can ask you today 16 to which you would not assert your Fifth 17 Amendment rights? 18 A. On advice of my attorney, I take 19 the Fifth. 20 Q. Mr. Steuerman, you understand, do 21 you not, that other than for murder, the 22 statute of limitations has run on any criminal 23 conduct you may have engaged in in the 1980s. 24 Is that correct? 25 A. On advice of my attorney, I take 26 the Fifth. 27 C. Do you have such an understanding? 28 A. On advice of my attorney, I take 29 ToDD STEUERMAN 20 Lists	5	•		•
8	6		6	(Time noted: 1:43 p.m.)
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## TODD STEUERMAN TANKLEFF vs. COUNTY OF SUFFOLK

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the same has been read to me, and the same is		Reason for change:	
true and accurate, save and except for changes		Page No Line No Change	to:
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